

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

SIX-DAY TO FIVE DAY STREET DELIVERY  
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO  
INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
(APWU/USPS-T4-9)

The United States Postal Service hereby provides the response of witness Frank Neri to the following interrogatory of the American Postal Workers Union, dated July 6, 2010: APWU/USPS-T4-9. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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TO INTERROGATORY OF THE AMERICAN POSTAL WORKERS UNION**

**APWU/USPS-T4-9**

Please refer to your response to APWU/USPS-T4-7(c). Why are anticipated 5-day delivery workload changes not being factored into any current AMP studies or those approved but not yet implemented? Will a change in delivery workload impact the AMP studies?

**RESPONSE**

An AMP feasibility study is conducted to determine whether there is a business case for relocating processing and distribution operations from one location to another based upon actual volume data. Upon implementation of five-day delivery, any change in workload will be factored into future studies.

If it is determined that there is a need to increase capacity at locations where there are current AMP studies or approved but not yet implemented studies, this will be accomplished prior to five-day delivery implementation, as we would for any other site. By design, AMP post-implementation reviews will be used to analyze impacts that may require an adjustment to local processing plans.